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ATTORNEYS FOR DEBTOR

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

IN RE:

**2M RESEARCH SERVICES LLC and
MARCUS E. MARTIN,**

Debtors.

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§
§

**CASE NO. 23-40271-11
Chapter 11**

**POST-CONFIRMATION MODIFICATION TO DEBTORS' FIFTH
AMENDED JOINT PLAN OF REORGANIZATION [Docket No. 257]**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

COMES NOW 2M Research Services LLC and Marcus E. Martin, the debtors herein ("Debtors"), and file this heir Post-Confirmation Modification to the Debtors' *Fifth Amended Joint Plan of Reorganization* filed on August 28, 2024 [Docket No. 257, the "Plan"]. The Plan provided that the Debtors may modify the Plan at any time after Confirmation, upon compliance with Bankruptcy Code § 1127. The Debtors or their attorney shall provide notice of any such proposed modification to all Creditors and other parties in interest in these Chapter 11 proceedings. If, in the opinion of the Bankruptcy Court, the modification does not materially and adversely affect the interest of the Creditors, the Bankruptcy Court may modify the Plan without notice to Creditors, or may modify the Plan upon notice only to those Creditors that the Bankruptcy Court deems to be materially and adversely affected. Debtors would show as follows:

1. Debtors propose the following Post-Confirmation Modification.

CLAIMS AGAINST 2M RESEARCH SERVICES, LLC

Class 2M 4: Allowed Secured Claim of Texas Workforce Commission.

This Claim shall be paid in full in equal monthly installments of principal with interest thereon at the rate of 9.50% per annum. Payments will commence on the first day of the first month following the Effective Date and continue until the expiration of 60 months from the Petition Date.

Notwithstanding anything in the Plan to the contrary, the Plan shall not release or discharge any entity, other than the Debtors or Reorganized Debtors, from any liability owed to the Texas Workforce Commission for a tax debt, including interest and penalties on such tax. This provision is not an admission by any party that such liability exists.

Notwithstanding anything in the Plan to the contrary, the Plan shall not limit the Texas Workforce Commission's setoff rights under 11 U.S.C. § 553. This provision is not admission by any party that such setoff rights exist.

A failure by the reorganized Debtor to make a payment to the TWC pursuant to the terms of the Plan shall be an Event of Default. If the reorganized Debtor fails to cure an Event of Default as to tax payments within ten (10) calendar days after service of written notice of default from the TWC, the TWC may (a) enforce the entire amount of its claim, (b) exercise all rights and remedies under applicable nonbankruptcy law, and (c) seek such relief as may be appropriate in this Court. Notice of the default shall be served by first class mail upon the reorganized Debtor at: 1305 Grayhawk Drive, Mansfield, Texas 76063, Attn: Chief Executive Officer, and to Debtors' attorney at Joyce W. Lindauer Attorney, PLLC, 1412 Main Street, Suite 500, Dallas, Texas 75202; Attn: Joyce W. Lindauer, Esq.; joyce@joycelindauer.com.

Debtor shall be allowed to cure up to two (2) defaults. Upon a third default, the TWC, at its option, may declare the default non-cureable and proceed to collect the remainder of the debt.

This Claim is Impaired, and the holder of this Claim is entitled to vote to accept or reject the Plan.

Dated: October 18, 2024.

Respectfully submitted,

/s/ Joyce W. Lindauer
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Attorneys for Debtors

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that on October 14, 2024, Sherri Simpson in the Texas Attorney General's Office on behalf of the Texas Workforce Commission reviewed and approved the foregoing Plan Modification.

/s/ Joyce W. Lindauer
Joyce W. Lindauer

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on October 18, 2024, a true and correct copy of the foregoing document was served via United States first class mail, postage prepaid, upon the parties on the attached service list.

/s/ Joyce W. Lindauer
Joyce W. Lindauer

Label Matrix for local noticing
0539-4
Case 23-40271-mxm11
Northern District of Texas
Ft. Worth
Fri Oct 18 16:26:31 CDT 2024

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Dallas, TX 75240-6882

Texas Workforce Commission
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c/o Sherri K. Simpson, Paralegal
P.O. Box 12548
Austin, TX 78711-2548

501 W. Tenth Street
Fort Worth, TX 76102-3637

Abt Associates
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300 Throckmorton Street, Suite 520
Fort Worth, TX 76102-2929

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C/O Mcc Lienmaster
23240 Chagrin Blvd 410
Beachwood, OH 44122-5415

Comptroller of the Treasury
301 W Preston Street Room #409
Baltimore, MD 21201-2383

(p)GEORGIA DEPARTMENT OF REVENUE
COMPLIANCE DIVISION
ARCS BANKRUPTCY
1800 CENTURY BLVD NE SUITE 9100
ATLANTA GA 30345-3202

Internal Revenue Service
1100 Commerce Street, MS 5027
Dallas Texas 75242.
Attention: Insolvency 75242-1100

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Grand Prairie, TX 75050-1322

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Dallas, TX 75207-2328

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14841 Dallas Parkway
Suite 425
Dallas, TX 75254-8067

2M Research Services 401(k) Profit Sharing P
c/o U.S. Department of Labor, EBSA
525 S. Griffin Street, Suite 900
Dallas, TX 75202-5042

Applied Engineering Management Corporation
c/o Jameson & Dunagan, PC
5429 LBJ Freeway Suite 300
Dallas, Texas 75240-2645

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1702 Townhurst Drive
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Houston, TX 77043-2811

ECMC
PO Box 16408
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33 S State St
Chicago, IL 60603-2808

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c/o Robertson, Anschutz, Schneid,
Crane & Partners, PLLC
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Boca Raton, FL 33487-2853

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Christopher S. Murphy
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Austin, TX 78711-2548

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Dallas, TX 75202-5042

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Attn: Andrea C. Davison
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Arlington, TX 76010-2774

On Deck Capital, Inc.
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New York, NY 10018-5300

Ondeck Capital
1400 Broadway FL 25
New York, NY 10018-5225

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503 Hwy 2W
Devils Lake, ND 58301

Paul Ruggiere
4308 Winnetka Rd
Corinth, TX 76208-4820

Pragmatic Financial, LLC
2606 Bunker Hill
McKinney, TX 75070-4527

Reserve Funding LLC
15 WEST 47TH STREET
SUITE 704
New York, NY 10036-3371

Small Business Administration
14925 Kingsport Rd.
Fort Worth, TX 76155-2243

State of Maryland Revenue Office, Comptrolle
Revenue Administration Division
10 Carroll Street
Annapolis, MD 21411-0001

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c/o John Kendrick Turner
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Suite 1000
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Texas Workforce Commission
Office of Attorney General
BK/Collections
P.O. BOX 12548, MC008
Austin, TX 787112548

U.S. Bank, N.A. d/b/a U.S. Bank Equipment Fi
1310 Madrid Street
Marshall, MN 56258-4099

United States Trustee
1100 Commerce Street
Room 976
Dallas, TX 75242-0996

VW Credit, Inc.
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Addison, Texas 75001-9013

Vickie Kennard
121 Autumn Trail
Red Oak, TX 75154-4712

Wells Fargo Bank, N.A.
Small Business Lending Division
P.O. Box 29482 MAC S4101-08C
Phoenix, AZ 85038-9482

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Devils Lake, ND 58301

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Quincy, MA 02169-4203

Areya Aurzada
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DALLAS TX 75202-4042

Marcus E Martin
Main Document
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Mansfield, TX 76063-5555

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

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1800 CENTURY BLVD NE
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Fort Worth, TX 76102

Joyce W. Lindauer
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Suite 500
Dallas, TX 75202

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Abt Associates Inc.

(u)PHH Mortgage Corporation

(u)Small Business Administration

(u)United States Of America Internal Revenue

(d)VW Credit, Inc.
PO Box 9013
Addison, Texas 75001-9013

End of Label Matrix	
Mailable recipients	61
Bypassed recipients	5
Total	66